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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Abraham Chol Keech, and
Peter Biar Ajak,

Defendants.

No. CR-24-00394-PHX-SPL

**UNOPPOSED MOTION FOR ENTRY
OF PROTECTIVE ORDER PURSUANT
TO SECTION 3 OF THE CLASSIFIED
INFORMATION PROCEDURES ACT**

The United States, with the consent of defendants Abraham Chol Keech and Peter Biar Ajak, by their counsel, hereby moves the Court, pursuant to Section 3 of the Classified

1 Information Procedures Act, 18 U.S.C. App. III (CIPA); the Revised Security Procedures
2 established pursuant to Pub. L. 96-456, 94 Stat. 2025, by the Chief Justice of the United
3 States for the Protection of Classified Information (hereinafter “Security Procedures,”
4 which are reprinted after CIPA § 9); the Federal Rules of Criminal Procedure 16(d) and
5 57; the general supervisory authority of the Court; and to protect the national security, to
6 enter the attached proposed Protective Order regarding the disclosure and dissemination of
7 classified national security information that will be made available to the defense by the
8 United States. In support of this motion, the United States provides as follows:

9 1. Section 3 of CIPA requires, upon motion of the United States, that the Court
10 “shall issue an order to protect against the disclosure of any classified information disclosed
11 by the United States to any defendant in any criminal case in a district court of the United
12 States.”

13 2. Rule 16(d)(1) of the Federal Rules of Criminal Procedure provides that the
14 Court may, for good cause, deny, restrict, or defer discovery or inspection, or grant other
15 appropriate relief.

16 3. Accordingly, the proposed Protective Order regulates discovery in this case
17 by restricting the use and dissemination of classified documents and information obtained
18 through discovery.

19 4. The defendants and their counsel have reviewed this motion and the proposed
20 Protective Order and have agreed to its terms.

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1 For these reasons, the United States respectfully requests that the Court enter the
2 proposed Protective Order Pertaining to Classified Information.

3 Respectfully submitted this 25th day of June, 2025.

4 TIMOTHY COURCHAINED
5 United States Attorney
6 District of Arizona

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8 s/ Amy Chang
9 AMY C. CHANG
10 RAYMOND K. WOO
11 M. BRIDGET MINDER
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LESLIE C. ESBROOK
CHRISTOPHER M. COOK
Trial Attorneys, National Security Division

CERTIFICATE OF SERVICE

15 I hereby certify that on June 25, 2025, I electronically transmitted the attached
16 document to the clerk's office using the CM/ECF System for filing, and transmittal of a
17 Notice of Electronic Filing to the CM/ECF registrants in this case:

18 Richard C. Bock and Dominic Rizzi, *Attorneys for Abraham Keech*
19 Kurt Altman, *Attorney for Peter Ajak*

20 s/ Alexandria Gaulin
21 U.S. Attorney's Office